

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re  
Zen JV, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11  
Case No. 25-11195 (JKS)

(Jointly Administered)

Re: Docket No. 367

**ORDER GRANTING FIRST AND FINAL APPLICATION OF ALAN CHAPELL,  
CONSUMER PRIVACY OMBUDSMAN, APPOINTED PURSUANT TO SECTION  
332 OF THE BANKRUPTCY CODE FOR APPROVAL AND ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED DURING THE PERIOD FROM  
JULY 8, 2025 THROUGH AND INCLUDING JULY 28, 2025**

Upon consideration of the final fee application (the “Final Fee Application”) of Alan Chapell, Esq., the consumer privacy ombudsman appointed pursuant to section 332 of the Bankruptcy Code, (the “Applicant”), for entry of an order (this “Order”) for allowance of compensation for professional services and reimbursement of actual and necessary expenses that the Applicant incurred, all as more fully set forth in the Final Fee Application, pursuant to 11 U.S.C. § 330(a) and Rule 2016 of the Federal Rules of Bankruptcy Procedure and the *Order Pursuant to 11 U.S.C. §§ 331, 330, and 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 258], and it appearing that the Court has jurisdiction to consider the Final Fee Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and this Final Fee Application

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Final Fee Application having been given; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Final Fee Application is hereby **APPROVED** on a final basis.
2. The Applicant is granted final allowance of compensation and reimbursement of reasonable and necessary expenses in the total amount of \$30,400.00.
3. The Debtors are hereby authorized and directed to pay such amount to Alan Chapell within five (5) days from the date of this Order.
4. The Debtors are authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.
5. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to this Order.